

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

JAMES M. BAKER, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00272-GMS
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: CLASS ACTION
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ROCHELLE PHILLIPS, On Behalf of
Herself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00277-GMS
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: CLASS ACTION
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ROBERT WILKINS, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00287-GMS
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: CLASS ACTION
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LEONARD BRONSTEIN, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

V.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00289-GMS

CLASS ACTION

GREGG PENN, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00293-GMS

CLASS ACTION

CLIFFORD W. JONES, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00316-GMS

CLASS ACTION

MICHAEL D. BLUM, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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: Case No. 1:05-cv-00372-GMS
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: CLASS ACTION
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STIPULATION AND ORDER

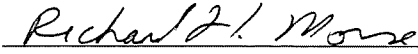
WHEREAS putative class member Activist Investmentgesellschaft mbH for account of the PT-Master fund, represented by the law firm of Milberg Weiss Bershad & Schulman LLP, has filed a motion for consolidation of the above-referenced actions, for appointment as Lead Plaintiff and for approval of selection of Lead Counsel, and

WHEREAS said motion is unopposed as of the date below,

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for the parties herein and subject to the Order of this Court, that (i) Lead Plaintiff will serve a consolidated amended complaint no later than 60 days after a decision is entered on the pending motions for appointment of Lead Plaintiff and approval of Lead Counsel, (ii) Defendants' answers to or motions to dismiss the consolidated amended complaint will be served no later than 60 days after the consolidated amended complaint is served, (iii) in the event that a motion to dismiss is made by one or more Defendants, Lead Plaintiff will have 60 days to file its answering

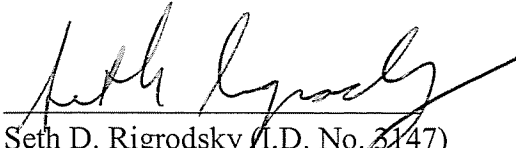
brief in response to such motion to dismiss and the moving Defendant or Defendants will have 45 days to submit their reply.

September 12, 2005


Richard H. Morse (I.D. No. 531)
YOUNG, CONAWAY, STARGATT &
TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6000
rmorse@ycst.com


Richard J. Urowsky
Richard C. Pepperman, II
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
(212) 558-4000

Attorneys for Defendants


Seth D. Rigrodsky (I.D. No. 3147)
Ralph Sianni (I.D. No. 4151)
MILBERG WEISS BERSHAD & SCHULMAN LLP
919 N. Market Street, Suite 411
Wilmington, Delaware 19801
rsianni@milbergweiss.com
srigrodsky@milbergweiss.com

Steven G. Schulman
Peter E. Seidman
Deborah M. Sturman
Andrei V. Rado
MILBERG WEISS BERSHAD & SCHULMAN LLP
One Pennsylvania Plaza -- 49th Floor
New York, NY 10119
(212) 868-1229

*Attorneys for Plaintiffs Rochelle Phillips and Clifford W. Jones
and Proposed Lead Plaintiff Activist Investmentgesellschaft mbH*



Joseph A. Rosenthal (I.D. No. 234)
Jeffrey S. Goddess (I.D. No. 630)
ROSENTHAL, MONHAIT, GROSS & GODDESS
Mellon Bank Center, Suite 1401
P. O. Box 1070
Wilmington, DE 19899-1070
jgoddess@rmgglaw.com

*Attorneys for Plaintiffs James M. Baker, Leonard Bronstein, Robert Wilkins, Greg Penn,
and Michael D. Blum*

SO ORDERED, this ____ day of September, 2005

United States District Judge